



## DEPARTMENT OF HEALTH & HUMAN SERVICES

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ADMINISTRATION FOR CHILDREN AND FAMILIES

**Office of Head Start**


8th Floor Portal Building  
1250 Maryland Avenue, SW  
Washington, DC 20024

**To: Board Chairperson**

*Mr. John Calvin Davis  
Board Chairperson  
Community Action Organization of Erie County, Inc.  
70 Harvard Pl.  
Buffalo, NY 14209*

**From: Responsible HHS Official**

*Ms. Yvette Sanchez Fuentes  
Director, Office of Head Start*

 6/30/10  
Date

### Overview of Findings

From 4/25/2010 to 4/30/2010, the Administration for Children and Families (ACF) conducted an on-site monitoring review of the Community Action Organization of Erie County, Inc. Head Start and Early Head Start programs. We wish to thank the governing body, Policy Council, staff, and parents of your program for their cooperation and assistance during the review. This Head Start Review Report has been issued to Mr. John Calvin Davis, Board Chairperson, as legal notice to your agency of the results of the on-site program review.

Based on the information gathered during our review, your Head Start and Early Head Start programs were found to be out of compliance with one or more applicable Head Start Program Performance Standards, laws, regulations, and policy requirements. The report provides you with detailed information in each area where program performance did not meet applicable Head Start Program Performance Standards, laws, regulations, and policy requirements. Each area of noncompliance identified in this report should be corrected within 120 days following receipt of this report.

Since 2009 two new features were added as applicable to triennial and first year reports. First, if during the course of a review an area of noncompliance was identified and corrected on site, the report will include a narrative to describe the area of noncompliance and a narrative to describe the corrective action the grantee took to correct the finding. No further corrective action is necessary for an area of noncompliance reported as corrected on site.

Secondly, program strengths identified during the on site review will also be included in triennial and first year review reports.

Beginning in Fiscal Year 2010, if you are a grantee serving preschool age children in the center-based option, a sample of your preschool classrooms will be observed using the Classroom Assessment Scoring System (CLASS). This classroom observation instrument looks at the teacher/child interactions, as well as interactions between children. If you operate a center-based program for preschool age children, the results of CLASS will be included in your monitoring report as a separate attachment. The Office of Head Start encourages grantees to consider the CLASS results in planning ongoing efforts to improve classroom quality.

The ACF Regional Office will contact you soon to address any questions you may have about this report.

### **Distribution of the Head Start Review Report**

Copies of this report will be distributed to the following recipients:

Mr. Iran Rodriguez, Regional Program Manager  
Ms. Amie Westbrook, Policy Council Chairperson  
Mr. L. Nathan Hare, CEO/Executive Director  
Ms. Phyllis A. McBride, Head Start Director

### **Overview Information**

Review Type:	<i>Triennial</i>
Organization:	<i>Community Action Organization of Erie County, Inc.</i>
Program Type:	<i>Head Start and Early Head Start</i>
Team Leader:	<i>Ms. Denise Engstrom</i>
Funded Enrollment HS:	<i>1983</i>
Funded Enrollment EHS:	<i>117</i>

## **Area of Strength**

The grantee and its delegate agencies had several strengths benefiting children, families, and staff. The grantee received a University of Buffalo Hispanic/Latino Grant providing Early Childhood Education bachelor's degrees for 48 teachers in the program. Program staff were better prepared to meet the needs of enrolled children through the additional training provided through classes leading to Early Childhood degrees. This grant also ensured program staff would meet the Head Start mandate for qualified teachers.

The Holy Cross delegate's Nutrition Coordinator developed a Nutrition Subcommittee under the Health Services Advisory Committee (HSAC) to identify common nutritional issues and concerns in the program and share nutrition information with families along with other nutrition-related programs available in the community as they pertained to Head Start families and potential nutritional needs. The Nutrition Subcommittee met three times per year--November, February, and May--to gather information to be shared at the full HSAC meetings. Resources and information collected were provided to program staff and parents of children enrolled in the Head Start program. Committee members included the Holy Cross delegate's Head Start Nutrition Coordinator, the Child and Adult Care Food Program Director, the Erie and Niagara County Women, Infants and Children program representative, Catholic Charities, Cornell

University Cooperative Extension, the Erie County Department of Health Lead Prevention Specialist, and staff from the Food For All program. Parents in the Holy Cross program were able to provide better nutrition and healthier meals for their families through the efforts of the subcommittee.

Through efforts of the Facilities Coordinator for the Holy Cross program, a Safety Committee was formed to review all accidents and incidents occurring on Head Start premises. The committee met four times a year to review and discuss accidents and develop ways to reduce or prevent reoccurrences. Accidents among staff decreased significantly since the implementation of the committee. Program compensation claims decreased from 4 percent to 0.82 percent in 3 years. The committee also developed an accident prevention plan called Twenty-One Ways to Stop Accidents.

The Bethel Head Start program collaborated with the University of Buffalo School of Dental Medicine to provide dental examinations for children in celebration of National Give Kids a Smile Day. Of the 544 children enrolled, 291 children enrolled in the Bethel Head Start program were transported to the dental school for free services including examinations, cleanings, and fluoride treatments. If parents were present, x-rays, fillings, and extractions were completed for children needing the additional services.

### **New Area of Noncompliance Determinations**

At least one area of noncompliance was documented at Community Action Organization of Erie County, Inc. Head Start and Early Head Start programs.

<b>Applicable Standards</b>	<b>Program Type</b>	<b>Status</b>
<i>74.34(f)(3)</i>	<i>HS and EHS</i>	<i>Noncompliance</i>
<i>1304.51(g)</i>	<i>HS and EHS</i>	<i>Noncompliance</i>

#### **PART 74 - Financial And Program Management**

##### **74.34 Equipment.**

**(f) The recipient's property management standards for equipment acquired with Federal funds and federally-owned equipment shall include all of the following:**

**(3) The recipient shall take a physical inventory of equipment and the results reconciled with the equipment records at least once every two years. Any differences between quantities determined by the physical inspection and those shown in the accounting records shall be investigated to determine the causes of the difference. The recipient shall, in connection with the inventory, verify the existence, current utilization, and continued need for the equipment.**

The grantee did not reconcile the results of the physical inventory of equipment with the equipment records at least once every 2 years. Analysis of the audit reports for the years ending February 28, 2007, 2008, and 2009 found fixed assets increased by \$19,796 between March 1, 2007 and February 28, 2009. A review of the grantee's February 27, 2010 inventory listing for of equipment (with a unit cost over \$5,000) found equipment purchases of \$80,815 over the same period.

In an interview, the Vice President of Finance (VP-Finance) confirmed the grantee did not reconcile the physical inventory to the audit report. She also stated the amount in the audit report was an adjusted number and was carried forward since the grantee changed audit firms in 2003. The VP-Finance stated she was hired in 2002. She said the previous Fiscal Officer did not maintain a record of fixed assets, and there was no record to support the costs of most of the items on the inventory. The grantee did not reconcile the fixed-asset amount shown on the audit report to the physical inventory; therefore, it was not in compliance with the regulation.

#### **PART 1304 - Program Performance Standards For Operation Of Head Start Programs By Grantees And Delegate Agencies**

##### **1304.51 Management Systems and Procedures.**

**(g) Record-keeping systems. Grantee and delegate agencies must establish and maintain efficient and effective record-keeping systems to provide accurate and timely information regarding children, families, and staff and must ensure appropriate confidentiality of this information.**

The grantee and its delegate agencies did not establish and maintain efficient and effective record-keeping systems to provide accurate and timely information regarding children, families, and staff. A review of children's records found information was not consistently located and accessible in the files; areas of forms were not all filled out; and files did not consistently contain information necessary for reviewing child records.

A review of 196 children's files found 85--30 Education; 44 Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA); and 11 Health and Nutrition--reflected multiple record-keeping problems. Some examples included the following: one Education file had four different birth dates; four had no enrollment dates; two were missing Individualized Education Programs (IEPs) that were reported as developed; and one was missing parent consent for evaluation. Two income verification files were unable to be located for review and were replaced with two other files. Six Health and Nutrition files did not have complete documentation. While the information was not located, it was not possible to determine if services were not conducted for these children or if the documentation was missing.

In a review of four grantee personnel files none contained the most recent employee training information. Overall, grantee staff had difficulty locating information within the child files they were responsible for and also in other areas of the program where documentation was maintained. The Health Coordinator attempted to help locate and review children's files to find missing information and confirmed the grantee's record-keeping system needed improving. During interviews, the Family and Community Partnership Manager and Disabilities Manager confirmed the filing system made it difficult to locate information in an efficient and effective manner.

A review of 96 children's records at the Holy Cross delegate found 6 of 33 Education files were not consistently maintained. Staff were able to eventually locate the information, but there was no consistent system for organizing information in the files. A review of 20 files found 4 did not contain evidence of speech screenings; however, the screenings were later located during an interview with the Health Coordinator.

The grantee and its Holy Cross delegate did not establish and maintain efficient and effective record-keeping systems to provide accurate and timely information regarding children, families, and staff; therefore, it was not in compliance with the regulation.

Timeframe for Corrective Action

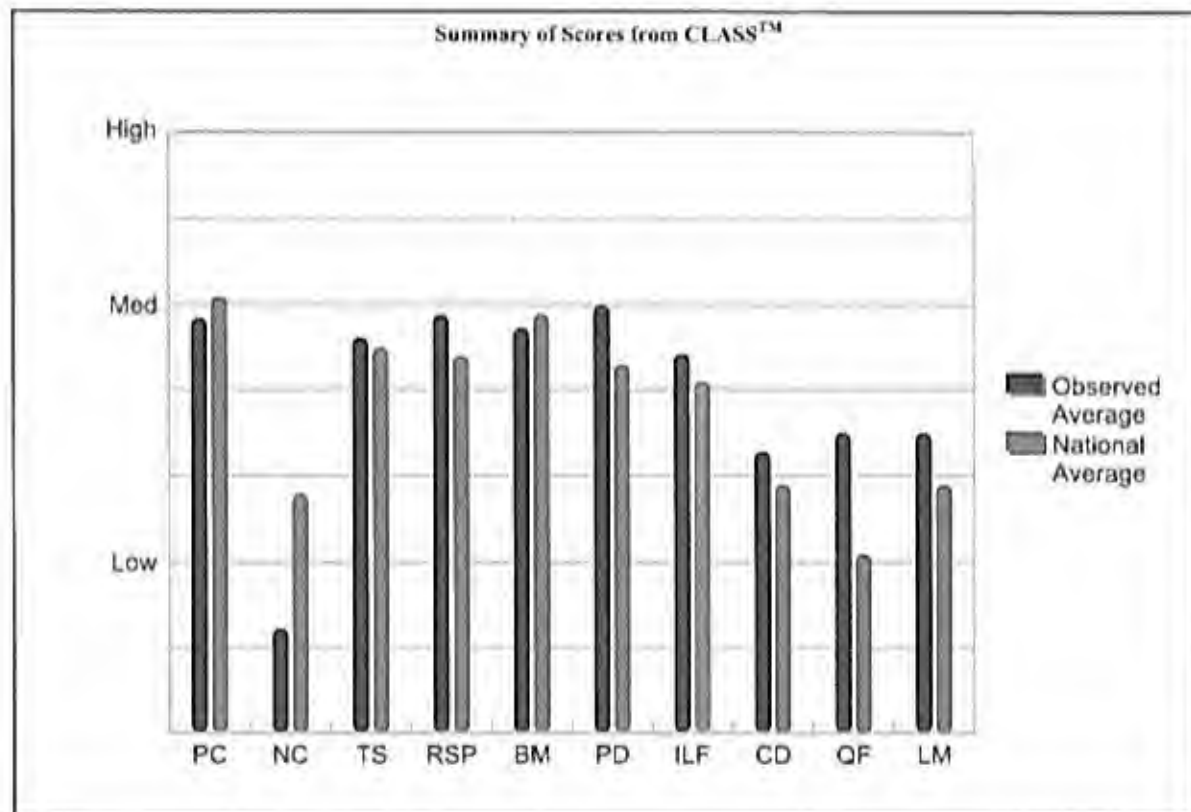
The area(s) of noncompliance cited in this report must be corrected within 120 days of the receipt of this report. Pursuant to Section 637(2)(C) of the Head Start Act, a grantee that fails to correct an area of noncompliance within the prescribed time period will be judged to have a deficiency that must be corrected within the time period required by the responsible HHS official.

— END OF REPORT —

## Results from CLASS™ Observations conducted at Community Action Organization of Erie County, Inc.

The following information represents the results of the preschool classroom observations with the Classroom Assessment Scoring System™ (CLASS™) which were conducted concurrent with your triennial review. The team observed 26 classrooms. These results are for your information and you are welcome to use this report in your quality improvement efforts if you find it helpful. This information is only representative of those classrooms where the CLASS™ observations took place.

The CLASS™ tool looks at 10 dimensions of teacher-student interactions and states those observed interactions on a seven point scale. The table on this page provides you with the average scores across the preschool classrooms observed in your program and the national average from a large study of early childhood classrooms. The chart on the next page will show the aggregate scores from all of your evaluated preschool classrooms along each of the ten dimensions, with a summary of the comments for each of these areas.



## Results from CLASS™ Observations conducted at Community Action Organization of Erie County, Inc.

Summary of Comments from Classroom Observations		
Dimension	Score	Summary
Positive Climate	4.8	There were indications in most classrooms that teachers and students enjoyed being together. Voices were calm and pleasant. There was close physical proximity between teachers and students most of the time. Many teachers had positive affect that matched that of their students. The majority of the students were happy. Positive communication was present but inconsistent across the classrooms. Teachers were respectful and courteous to the students. Students used polite manners with each other.
Negative Climate *	1.2	There were a few incidences of relatively mild negative responses to students' behavior in the classrooms visited. Teachers did not yell or threaten to establish control.
Teacher Sensitivity	4.6	Periodically, the teachers were not aware of students needing their support or attention. Teachers sometimes failed to notice lack of comprehension on the part of students. Subtle indications from students frequently went unnoticed. Generally, the teachers were effective in meeting students' needs and solving problems. Students felt secure in seeking help from the teachers as well as sharing their ideas.
Regard for Student Perspectives	4.9	Generally, the teachers encouraged the students to make their own decisions and choices and follow their interests. Overall, the teachers were supportive of students' initiative and gave them responsibilities. The students were always responsible for clean-up after activities. Occasionally, students were given roles that required them to lead the group. Mostly, students were given opportunities to express themselves and share ideas. The majority of teachers gave students freedom of movement.
Behavior Management	4.7	Rules and expectations were clear, and teachers were consistent in implementing them. Teachers were proactive in reviewing the rules. There were teachers who were able to redirect potential misbehaviors in some classrooms. The teachers practiced preventive strategies by providing highly motivating activities. There were minimal examples of misbehavior in the classrooms.
Productivity	5.0	The teachers organized their classrooms into centers, which maximized the time students were engaged in learning objectives. The students knew the routines and expectations. Most teachers established transition procedures that were familiar to the students. Teachers had materials readily accessible and were well prepared.
Instructional Learning Formats	4.4	The teachers occasionally offered opportunities for increased learning through active participation by students. Most teachers provided a variety of materials and modalities to increase students' interest. Some students had intermittent interest in the activities provided. Learning objectives were individualized.
Concept Development	3.3	A few teachers occasionally used strategies that promoted analysis and reasoning, but most did not. "How" and "why" questions were rarely asked. Creativity was almost always generated by students, but teachers failed to maximize the learning potential of these experiences. Few attempts to integrate previous knowledge occurred. There was limited reference to the students' lives.
Quality of Feedback	3.5	When students gave incorrect responses or did not answer at all, the teachers did not use these occasions as opportunities to provide hints or assistance for expansion on the part of the students. Feedback loops were frequent but brief and did not necessarily promote learning. "Why" questions were rare. Teachers provided factual

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**Results from CLASS™ Observations conducted at  
Community Action Organization of Erie County, Inc.**

		information about the subjects being discussed. Teachers provided encouragement and acknowledged students' efforts.
Language Modeling	3,5	Conversations flowed freely in the classrooms among students and between students and teachers. Open-ended questions, repetition, and extension were infrequent. Teachers did not use self- or parallel talk. Some teachers modeled advanced language, and some used it to impart facts.

\* - Low score suggests a developmentally appropriate learning climate that fosters students' well-being.

- High score suggests that this is an area that teachers could improve to create a more positive climate for students.